

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

CHRISTOPHER HEAD,
a/k/a. "BRISS"

Defendant.

Case No. 1:13-cr-350-LMB-10

The Honorable Leonie M. Brinkema



STATEMENT OF FACTS

The United States and the defendant, Christopher Head, agree that had this matter proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt:

1. The "Nine Trey Gangsters" (NTG) is a criminal street gang operating within the Eastern District of Virginia and a set of the United Blood Nation. Members and associates of NTG were engaged in a racketeering conspiracy involving the unlawful distribution of cocaine base and other illegal narcotics, as well as robbery, and other crimes of violence. Members and associates of NTG were also engaged in the sex trafficking of adults by coercion or force, in Virginia and other states on the East Coast, from at least in and around 2011 to in and around August 2013.

2. The defendant, Christopher Head, also known as "Briss," is an NTG member that had the rank of "Low-Stain" in a line-up that had members in Virginia, Maryland, and the District of Columbia. The Low-Stain is the second highest rank in a Nine Trey Gangster line-up and the defendant answered to Curtis Martino, a/k/a "Red Rum," who was the line-up's "High

Stain” or leader. Curtis Martino answered to the gang’s “Godfathers” in New York. The Low-Stain has five-star through one-star generals beneath him. Below the generals are “soldiers.”

3. Christopher Head’s nickname “Briss” was a modification of the defendant’s first name, because NTG members avoid using the letter “C” due to their historical rivalry with the Crips street gang.

4. Christopher Head distributed cocaine base and other illegal drugs during the course of the conspiracy. However, as the line-up’s Low-Stain, Head’s role did not necessarily always involve hands-on contact with narcotics or firearms. He was instead kept informed of the activities of those beneath him in the line-up and Christopher Head’s rank permitted him to approve or disapprove those criminal acts. The following intercepts of phone calls and text messages demonstrate Christopher Head’s role in and knowledge of the enterprise’s criminal activities to include a conspiracy to distribute cocaine base:

- a. On June 15, 2012, in a seventeen minute phone conversation, Heavenly Sovereignty, an NTG 4-star General in the defendant’s line-up, discusses with the defendant crack cocaine sales in the Eastern District of Virginia by Sovereignty, Raymond Dawes, and Lovell Ritchie. Dawes and Ritchie are also NTG members in the same line-up as Christopher Head. Sovereignty, Ritchie, and Dawes recently pleaded guilty to Conspiracy to Distribute 280 grams or more of Cocaine Base in the Richmond Division of the United States District Court for the Eastern District of Virginia (3:13CR72-JRS).
- b. On June 25, 2012, in a nine minute phone conversation, Christopher Head told Heavenly Sovereignty that he had directed another NTG member to collect money belonging to the gang from a woman that had it and send it to other

NTG members. Sovereignty informs Head that he has not been taking calls for crack cocaine sales because he feels that law enforcement has been tipped off to him by others that have been recently arrested and that the police also know Sovereignty's car. Head tells Sovereignty that he also has not been able to sell cocaine where he is because of law enforcement efforts and he will be purchasing ecstasy and prescription pain pills on the coming Friday to sell instead.

- c. On June 28, 2012, in two phone conversations, Heavenly Sovereignty tells Christopher Head that Lovell Richie, Antwan Minor, and Joshua Pendleton Brooks are the only NTG members in the line-up pulling their weight when it comes to crack cocaine sales. Sovereignty tells Head that he forgot his drug supply and Head tells Sovereignty he already gave his remaining supply to two other NTG members. Christopher Head informs Heavenly Sovereignty of the current rank structure of the line-up. Head tells Sovereignty that Joshua Pendleton Brooks is the three-star general and he needs to be the "violent one" for when the gang goes to "war."
- d. On July 8, 2012, in a five minute phone conversation, Heavenly Sovereignty tells Christopher Head that he is still selling "hard," referring to crack cocaine, for now but that "soft," referring to powder cocaine is selling faster because customers are now diluting and injecting the powder cocaine.
- e. On July 23, 2012, NTG members Kaleef Tweedy and Devante Jordan were arrested for armed robbery in the District of Columbia. On August 24, 2013, after being called by Devante Jordan, Christopher Head texted an "NTG alert"

to all members of the line-up informing them of the arrests. Head told Devante Jordan that whichever one of the two gang members charged had the least criminal record should admit responsibility for the firearm to spare the other more serious punishment.

- f. On January 12, 2013, NTG member Antwan Minor sent a text message to Christopher Head notifying him that he was headed to complete a drug transaction with fellow gang member Jameel Aleem. Minor further informed the defendant that he was armed with a firearm and planned to use it if there was any difficulty completing the transaction with Jameel Aleem. The defendant replied asking what other NTG members Antwan Minor took with him for back-up and Head also indicated that he had spoken about the situation with Curtis Martino. Head told Minor to keep him informed of what developed between Minor and Aleem.

5. It was reasonably foreseeable to Christopher Head that at least 280 grams, but not more than 840 grams, of cocaine base was distributed during the conspiracy.

6. Christopher Head was also involved in maintaining discipline within the gang. For example, when NTG member Lionel Ritchie smoked phencyclidine, also known as PCP, in violation of gang rules, Christopher Head was notified by a lower-ranking member and then informed Curtis Martino. A disciplinary beating was given to Ritchie by other NTG members.

7. NTG members were required to pay \$31 in monthly dues. These dues were paid to Curtis Martino by Christopher Head and other members of his line-up. A portion of the dues were then sent to NTG leaders in New York. The defendant assisted with collection of dues and knew that gang members often paid their dues from the proceeds of drug sales and robberies.

8. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the government. It does not include each and every fact known to the defendant or the government, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

9. The actions of the defendant as recounted above were in all respects knowing and deliberate, and were not committed by accident, mistake, or other innocent reason.

Respectfully submitted,

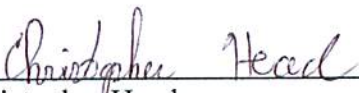
Dana J. Boente
Acting United States Attorney

By: 

Adam B. Schwartz
Dennis M. Fitzpatrick
Assistant United States Attorneys

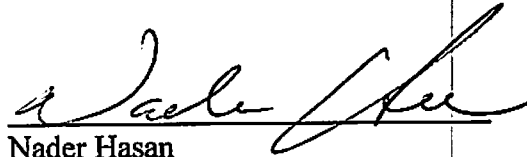
Defendant's Stipulation and Signature: After consulting with my attorney and pursuant to the plea agreement I entered into this day with the United States, I hereby stipulate that the above statement of facts is true and accurate, and that had the matter proceeded to trial, the United States would have proven the same beyond a reasonable doubt.

Date: November 24, 2013


Christopher Head
Defendant

Defense Counsel's Signature: I have carefully reviewed the above statement of facts with my client, Christopher Head. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 11.24.13

A handwritten signature in black ink, appearing to read "Nader Hasan", written over a horizontal line.

Nader Hasan
Counsel for the Defendant